

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

WARREN EASLEY,	:	No. 1:17-CV-0930
Plaintiff	:	
	:	Judge Rambo
v.	:	
	:	Electronically Filed Document
	:	
BRENDA TRITT, et al.	:	<i>Complaint Filed 05/26/17</i>
Defendants	:	

**CORRECTED BRIEF IN SUPPORT OF MOTION
FOR SUMMARY JUDGMENT**

Defendants, Albert, Corby¹, Dowd, Gregoire², Keller³, Kostinko⁴, Marhelko, Miller, Tomcavage, and Tritt, (“DOC Defendants”) of the Pennsylvania Department of Corrections (“DOC” or “Department”) hereby seek to correct a statement in their initial brief filed in support of their motion for summary judgment.

Defendants mistakenly had indicated that CO Corby was not named as being involved in any alleged wrongdoing in the amended complaint. (Doc. 338 at 14). Nevertheless, CO Corby was named as CO “Korby” in the amended complaint. CO Korby was identified in Paragraph 35 as having struck Plaintiff in the face while Plaintiff was in the restraint chair (Doc. 11, ¶35) and then he was left in the restraint chair for sixteen hours by Albert. (Doc. 11, ¶¶32-36). Thus, CO Corby joins in the

¹ Corby is named as “Karby” in the complaint.

² Gregoire is named as “Gregiore” in the complaint.

³ Keller is named as “Kellar” in the complaint.

⁴ Kostinko is named as “Kistinko” in the complaint.

arguments pertaining to alleged acts of force by the various Defendants in their initial brief. (See Doc. 338 at 30-36).

Respectfully submitted,

JOSH SHAPIRO
Attorney General

By: /s/ Lindsey A. Bedell

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Date: September 8, 2020

***Counsel for Albert, Boyce, Corby, Dowd,
Gregoire, Keller, Kostinko, Marhelko,
Miller, Tomcavage and Tritt***

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CERTIFICATE OF SERVICE

I, Lindsey A. Bedell, Deputy Attorney General for the Commonwealth of Pennsylvania, Office of Attorney General, hereby certify that on September 8, 2020, I caused to be served a true and correct copy of the foregoing document titled to the following:

VIA HAND DELIVERY⁵

Warren Easley KA-1544
SCI Forest
PO Box 33028
Pro Se Plaintiff

/s/ Lindsey A. Bedell
LINDSEY A. BEDELL
Deputy Attorney General

⁵ This alternative method of service through staff of the DOC is being used as a result of the COVID-19 emergency.